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August 10, 2020

## **VIA ECF**

Hon. Ronnie Abrams United States District Judge Southern District of New York 40 Foley Square New York, NY 10007

> Re: <u>United States v. James Siniscalchi</u> 19-cr-480 (RA)

## Dear Judge Abrams:

The undersigned represents James Siniscalchi in the above captioned matter. I write, with no objection from the Government or Pre-Trial Services, to respectfully request a modification to Mr. Siniscalchi's bail conditions.

Mr. Siniscalchi is currently out on bail secured by a \$150,000 personal recognizance bond co-signed by two financially responsible persons and \$20,000. His travel is limited to the SDNY/EDNY and WDNY.

I respectfully request that Mr. Siniscalchi's bond be modified to include the NDNY as well as the District of Connecticut. Mr. Siniscalchi has family in those regions. As noted, neither the Government nor pre-trial services have any objection to this request.

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Should	Your Honor require anything further on this issue I am available at the Co	urt's
convenience to	discuss the matter.	

Respectfully,	
MORVILLO PLLC	
BY:/s/	
Gregory Morvillo	

cc: AUSA Sarah Mortazavi (via ECF) Dominique Jackson, Pre-Trial Services Officer